

## **EXHIBIT F**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

UMG RECORDINGS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
GRANDE COMMUNICATIONS	)	No. 1:17-cv-00365
NETWORKS LLC and PATRIOT MEDIA	)	
CONSULTING, LLC,	)	
	)	
Defendants.	)	
	)	
	)	

**DEFENDANT PATRIOT MEDIA CONSULTING LLC'S OBJECTIONS  
AND RESPONSES TO PLAINTIFFS' FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND THINGS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Patriot Media Consulting LLC ("Patriot"), by and through its attorneys, hereby responds to Plaintiffs' First Set of Requests for Production of Documents and Things with the following responses and objections.

**GENERAL OBJECTIONS**

The following General Objections are incorporated by reference in each of Patriot's Specific Objections and Answers set forth below:

1. Patriot objects to Plaintiffs' instructions to the extent they impose obligations on Patriot that are inconsistent with or exceed those set forth in the Federal Rules of Civil Procedure, Rules of the United States District Court for the Western District of Texas, or any Order of this Court.
2. Patriot objects to the First Set of Requests for Production of Documents and Things to the extent they seek the disclosure or production of information protected by the

attorney-client privilege and/or work product doctrine. Such information shall not be provided in response to these requests, and any inadvertent disclosure thereof shall not be deemed a waiver of any privilege or protection with respect to such information or documents.

3. Patriot objects to the First Set of Requests for Production of Documents and Things to the extent they seek information or documents that are confidential, sensitive, and proprietary business information. Any such information that is responsive will be produced, if at all, only upon entry of a confidentiality agreement/protective order.

4. Patriot objects to the First Set of Requests for Production of Documents and Things as overly broad and unduly burdensome to the extent they seek information or documents not within the possession, custody, or control of Patriot.

5. Patriot objects to the First Set of Requests for Production of Documents and Things to the extent they seek information or documents that are neither relevant to the subject matter involved in this litigation nor proportional to the needs of the case.

6. Patriot objects to the First Set of Requests for Production of Documents and Things to the extent they call for the production of documents or information without any limitation, or with an unreasonable limitation, as to the date of the documents or information. Patriot will answer as to the relevant time period.

7. Patriot objects to the First Set of Requests for Production of Documents and Things to the extent they seek discovery of information or documents already within the possession and control of Plaintiffs and/or Plaintiffs' counsel, or that are available from public sources, on the grounds that each such request is unduly burdensome and oppressive.

8. Patriot objects to the First Set of Requests for Production of Documents and Things to the extent they seek information beyond what is available from a reasonable search of

those Patriot files likely to contain relevant or responsive documents pertaining to this litigation.

9. Patriot objects to the First Set of Requests for Production of Documents and Things to the extent they seek legal conclusions.

10. Patriot objects to the Definitions set forth in Plaintiffs' First Set of Requests for Production of Documents and Things, specifically, Patriot objects to the definition of "Plaintiffs' Copyrighted Work" as overly broad in that it purports to encompass materials not yet identified.

11. Patriot objects to the use of the term "concerning" in Plaintiffs' First Set of Requests for Production of Documents and Things as vague and ambiguous. Patriot understands and interprets such requests to seek documents that refer to the specific subject matter.

12. Patriot objects to Plaintiffs' First Set of Requests for Production of Documents and Things to the extent they seek information regarding copyrights other than those specifically identified in this litigation. Patriot will respond as to copyrights specifically identified in this litigation.

13. These responses to the First Set of Requests for Production of Documents and Things are based on the documents available at this time and upon such investigation as is reasonable for Patriot to undertake under the circumstances of these requests. Should further discovery result in additions to, changes in, or modifications of the following responses, or if additional documentation becomes available, Patriot reserves the right to supplement these General Objections, as well as its Specific Objections and Responses to the First Set of Requests for Production of Documents and Things.

**PATRIOT'S ANSWERS TO PLAINTIFFS' FIRST SET OF DOCUMENT REQUESTS**

**REQUEST NO. 1:**

All documents concerning any Plaintiff.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents concerning any Plaintiff to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 2:**

All documents concerning any of Plaintiffs' Copyrighted Works.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case. Patriot further objects to the definition of "Plaintiffs' Copyrighted Work" as overly broad, in that it purports to encompass materials not yet identified.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents concerning the copyrighted works identified in the Complaint, to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 3:**

All documents concerning Rightscorp.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents concerning Rightscorp to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 4:**

All documents concerning alleged copyright infringement of sound recordings through the use of internet service, including but not limited to such activity by Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case. Patriot further objects to the extent the request seeks information related to copyrights not at issue in this case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 5:**

All documents concerning BitTorrent or other Peer-to-Peer file systems, including but not limited to Customers' or Users' use of BitTorrent or other Peer-to-Peer file exchange systems.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work

product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 6:**

All documents concerning any research, studies, focus groups or surveys concerning: (a) any Customers or Users or potential Customers or Users who use or have used BitTorrent or other Peer-to-Peer file sharing, (b) alleged copyright infringement by any Customers or Users, or (c) alleged copyright infringing activity through internet service.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case. Patriot further objects to the extent the request seeks information related to copyrights not at issue in this case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 7:**

All documents reflecting or comprising communications between Grande and Patriot concerning any of the following topics: copyright infringement, Grande's or Patriot's potential legal exposure for copyright infringement, the DMCA, any DMCA Policy, any Acceptable Use Policy, any Repeat Infringer Policy, Notice(s) (in draft or final as-sent form), Grande's or Patriot's compliance with the DMCA, Grande's or Patriot's entitlement or lack of entitlement to the DMCA statutory safe harbor provisions, BitTorrent, Peer-to-Peer file sharing, and/or the Cox Litigation.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work

product, and as not proportional to the needs of the case. Patriot further objects to the extent the request seeks information related to copyrights not at issue in this case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 8:**

All documents reflecting or comprising communications between Patriot and any ISP for which Patriot provides or has provided any services, concerning any of the following topics: copyright infringement, Patriot's or the ISP's potential legal exposure for copyright infringement, the DMCA, any DMCA Policy, any Acceptable Use Policy, any Repeat Infringer Policy, DMCA Notice(s) (in draft or final as-sent form), Patriot's or the ISP's compliance with the DMCA, Patriot's or the IPS's entitlement or lack of entitlement to the DMCA statutory safe harbor provisions, BitTorrent, Peer-to-Peer file sharing, and/or the Cox Litigation.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 9:**

All documents concerning the sale of Grande to TPG addressing or relating to any of the following topics: copyright infringement, Grande's or Patriot's potential legal exposure for copyright infringement, the DMCA, any DMCA Policy, any Acceptable Use Policy, any Repeat Infringer Policy, DMCA Notice(s) (in draft or final as-sent form), Grande's or Patriot's compliance with the DMCA, Grande's entitlement or lack of entitlement to the DMCA statutory safe harbor provisions, BitTorrent, Peer-to-Peer file sharing, and/or the Cox Litigation.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad,



unduly burdensome and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Patriot will not produce any documents on the basis of these objections.

**REQUEST NO. 10:**

All documents reflecting or comprising communications between or among any of Patriot, Grande, TPG, or ABRY Partners, concerning any of the following topics: copyright infringement, Grande's or Patriot's potential legal exposure for copyright infringement, the DMCA, any DMCA Policy, any Acceptable Use Policy, any Repeat Infringer Policy, DMCA Notice(s) (in draft or final as-sent form), Grande's or Patriot's compliance with the DMCA, Grande's or Patriot's entitlement or lack of entitlement to the DMCA statutory safe harbor provisions, BitTorrent, Peer-to-Peer file sharing, and/or the Cox Litigation.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents relating to Patriot to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 11:**

Documents sufficient to show your corporate structure concerning the business of providing any services to Grande or any other ISP, including the relationship between any parent corporations, subsidiaries, or any affiliates engaged in your business of providing internet services.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, seeking irrelevant information, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and

are in Patriot's possession, custody, or control.

REQUEST NO. 12:

Documents sufficient to show the contractual agreements under which Patriot provides Grande with executive, management, or any other services, including the agreements themselves.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, seeking irrelevant information, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 13:

All documents concerning Patriot's roles and responsibilities with respect to its provision of executive, management, or any other services to Grande.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, seeking irrelevant information, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 14:

All documents concerning, reflecting, or comprising any DMCA Policy, including any draft or final versions of any such policy.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this

request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 15:

All documents concerning the employees or agents responsible for developing, conceiving, drafting and/or implementing any DMCA Policy.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and

unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this

request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 16:

Documents sufficient to show how and when any DMCA Policy was communicated to third parties, including but not limited to Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and

unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this

request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 17:

All documents concerning, reflecting, or comprising any Notice, including any draft or final versions of any such notice.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and

unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this

request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 18:

All documents concerning the employees or agents responsible for developing, conceiving, drafting and/or implementing any Notice.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 19:

Documents sufficient to show how and when any Notice was communicated to third parties, including but not limited to Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 20:

All documents concerning any Repeat Infringer Policy, including any draft or final versions of any such policy.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 21:

All documents concerning the employees or agents responsible for developing, conceiving, drafting and/or implementing any Repeat Infringer Policy.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 22:

Documents sufficient to show how and when any Repeat Infringer Policy was communicated to third parties, including but not limited to Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 23:

All documents concerning, reflecting, or comprising any Acceptable Use Policy, including any draft or final versions of any such policy.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 24:

All documents concerning the employees or agents responsible for developing, conceiving, drafting and/or implementing any Acceptable Use Policy.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

**REQUEST NO. 25:**

Documents sufficient to show how and when any Acceptable Use Policy was communicated to third parties, including but not limited to Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product.

Patriot will not produce any documents on the basis of these objections.

**REQUEST NO. 26:**

All documents since January 1, 2010, concerning any policy, practice, or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for investigating or responding to a DMCA Notice.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and

are in Patriot's possession, custody, or control.

REQUEST NO. 27:

All documents since January 1, 2010, concerning any policy, practice, or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for addressing or investigating copyright infringement claims, including any present in Notices.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 28:

All documents since January 1, 2010, concerning any policy, practice, or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for inquiries from or responses of Customers or Users to Notices or any other notices of copyright infringement claims they received.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 29:

All documents since January 1, 2010, concerning actions taken by Patriot, or any ISP for which Patriot provides or has provided any services, in response to any DMCA Notice received by Patriot or any such ISP. To the extent such actions have changed over time, this Request additionally calls for documents sufficient to show any such change and the time such change was made.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 30:**

All documents concerning, reflecting or comprising, communications from Patriot, or any ISP for which Patriot provides or has provided any services, to any of Customer or User, regarding any policy, practice, or capability for sending, receiving or responding to Notices or any other notices of copyright infringement claims.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 31:**

All documents reflecting or comprising press releases or other public statements Patriot, or any ISP for which Patriot provides or has provided any services, has made since January 1, 2010, concerning any of their policies, practices or capabilities for responding to Notices.



**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 32:**

All documents concerning any policy, practice or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for assigning or reassigning IP addresses to Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 33:**

All documents concerning, or communicated to or from, the Registered Copyright Agent for any ISP for which Patriot provides or has provided any services.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 34:

All documents concerning any policy, practice or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for taking adverse action (including without limitation, terminating or suspension of internet service) against Customers or Users of an ISP who may have infringed copyrights or who have been accused of infringing copyrights, including any repeat infringers.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 35:

All documents since January 1, 2010, concerning the effects of any DMCA Policy, Repeat Infringer Policy, Acceptable Use Policy, or any other policy, practice, or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for addressing, limiting or ending copyright infringement through the use of an ISP's internet services.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and

are in Patriot's possession, custody, or control.

REQUEST NO. 36:

All documents assessing or otherwise addressing the potential legal liability of Patriot, or any ISP for which Patriot provides or has provided any services, concerning the alleged copyright infringement engaged in by Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 37:

All documents since January 1, 2010, concerning any notice of alleged copyright infringement received by Patriot, or any ISP for which Patriot provides or has provided any services. Include all documents reflecting or comprising the notices themselves.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 38:

All documents since January 1, 2010, concerning any policy, practice or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered,

formulated or adopted for forwarding copyright infringement allegations to your Customers or Users, or otherwise informing Customers or Users of infringement claims.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 39:**

All documents since January 1, 2010, concerning notices or communications that Patriot, or any ISP for which Patriot provides or has provided any services, sent to Customers or Users notifying those Customers or Users of any copyright infringement allegations. Include all documents reflecting or comprising the notices or communications themselves.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 40:**

Documents sufficient to identify Patriot's or Grande's employees responsible for forwarding Notices, or the contents thereof, to Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and

seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 41:

All documents concerning advertising or communications by Patriot, or any ISP for which Patriot provides or has provided any services, to Customers or Users to discourage copyright infringement.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 42:

All documents since January 1, 2010, concerning, reflecting, or comprising communications that you or Grande received from Customers or Users in response to notices of alleged copyright infringement.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and

are in Patriot's possession, custody, or control.

REQUEST NO. 43:

All documents concerning, reflecting, or comprising communications between Patriot and any third party, other than Rightscorp, Inc., that sent a notice of alleged copyright infringement to Patriot, or any ISP for which Patriot provides or has provided any services, including all documents comprising such notices.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and seeking irrelevant information. Patriot further objects to this request as not proportional to the needs of the case. Based on these objections, Patriot will not produce any documents.

REQUEST NO. 44:

All documents concerning, reflecting, or comprising communications between any ISP for which Patriot provides or has provided any services, and any third party, other than Rightscorp, Inc., that sent a notice of alleged copyright infringement to Patriot, or the ISP, including all documents comprising such notices.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and seeking irrelevant information. Patriot further objects to this request as not proportional to the needs of the case. Based on these objections, Patriot will not produce any documents.

REQUEST NO. 45:

All documents since January 1, 2010, concerning, reflecting, or comprising communications from Patriot, or any ISP for which Patriot provides or has provided any services, to Customers or Users, of any DMCA Policy, Acceptable Use Policy, Repeat Infringer Policy, or any other Patriot or ISP policies, practices or capabilities concerning infringement of copyrights using internet services.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 46:

All documents concerning the awareness of Customers or Users of any DMCA Policy and/or other Patriot or ISP policies concerning infringement of copyrights.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 47:

All documents since January 1, 2010, concerning any investigation by Patriot or any ISP into any allegation of copyright infringement.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 48:

Documents sufficient to show your policies, practices, and capabilities for handling Notices that are received by Grande's or any other ISP's Registered Copyright Agent.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 49:

All documents concerning Patriot's or any ISP's identification of Customers or Users alleged to have infringed a copyright.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 50:

All documents concerning Patriot's or any ISP's identification of Customers or Users accused of infringing a copyright more than once.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.



Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 51:

All documents since January 1, 2010, concerning Patriot, or any ISP for which Patriot provides or has provided any services, efforts to determine if any of Customers or Users repeatedly infringe copyrights using internet service.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 52:

All documents concerning any policy, practice or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for tracking or determining the identity of Customers or Users associated with an IP address.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 53:

All documents concerning any policy, practice or capability that Patriot, Grande, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for determining the identity of a Customer or User who is the subject of a copyright infringement allegation.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 54:

All documents concerning the termination of any of Grande's or any other ISP's Customers or Users for a violation of any provision of any DMCA Policy, Acceptable Use Policy, Repeat Infringer Policy, or any other Patriot or ISP policies, practices or capabilities concerning infringement of copyrights using internet service.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 55:

All documents concerning any policy, practice or capability that Patriot, or any ISP for which Patriot provides or has provided any services, considered, formulated, or adopted for terminating internet services to Customers or Users arising from repeated allegations of copyright infringement.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 56:

All documents concerning any technological barriers or other means or mechanisms implemented by Grande or any other ISP to address, limit or prevent copyright infringement by your Customers or Users through the use of BitTorrent or Peer-to-Peer file sharing systems.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 57:

All documents concerning any technological barriers or other means or mechanisms that prohibit Grande or any other ISP from addressing or limiting copyright infringement by your Customers or Users through the use of BitTorrent or Peer-to-Peer file sharing systems.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

REQUEST NO. 58:

Documents sufficient to show or from which it may be determined the number of Grande's or any other ISP's Customers or Users whose service was terminated as a result of allegations of repeat copyright infringement, per month since January 1, 2010.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

**REQUEST NO. 59:**

Documents sufficient to show or from which it may be determined the number of Grande's or any other ISP's Customers or Users against whom Patriot, Grande, or any other ISP have taken action or implemented measures in response to a Notice, per month, since January 1, 2010.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

**REQUEST NO. 60:**

All documents since January 1, 2010, concerning the average cost to Grande of obtaining a Customer or User.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and seeking irrelevant information. Patriot further objects to this request as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the

parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 61:

All documents since January 1, 2010, concerning Grande's average yearly revenue and profit for Customers for each level of internet service that Grande offers.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and seeking irrelevant information. Patriot further objects to this request as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 62:

All documents since January 1, 2010, concerning the estimated total revenue and profit per Grande Customer account for the life of the account.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome. Patriot objects to the extent the request is not proportional to the needs of the case and seeks information not relevant to the claims or defenses at issue in this litigation.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 63:

Documents sufficient to show the amount and calculation of payments, compensation, assets, or any other things of value provided to Patriot by Grande, since January 1, 2010.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome. Patriot objects to the extent the request is not proportional to the needs of the case and seeks information not relevant to the claims or defenses at issue in this litigation.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 64:**

Documents sufficient to show the average length of time Grande retains Customers or Users.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome. Patriot objects to the extent the request is not proportional to the needs of the case and seeks information not relevant to the claims or defenses at issue in this litigation.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 65:**

Documents sufficient to show or from which it may be determined Grande's total number of Customers or Users in the United States.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome. Patriot objects to the extent the request is not proportional to the needs of the case and seeks information not relevant to the claims or defenses at issue in this litigation.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 66:

Documents since January 1, 2010, sufficient to show Grande's pricing for the different levels of internet services offered to Customers.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and seeking irrelevant information. Patriot further objects to this request as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 67:

Documents sufficient to show all terms of use and terms of service provided to Grande's or any other IPS's Customers or Users from January 1, 2010 to the present.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 68:

All documents concerning any changes to any ISP's terms of use or terms of service relating to copyright infringement or allegations of copyright infringement.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and unduly burdensome as it seeks documents unrelated to Patriot. Patriot further objects to this request as seeking privileged attorney-client communications and/or protected work product. Patriot will not produce any documents on the basis of these objections.

**REQUEST NO. 69:**

All documents since January 1, 2010, concerning Patriot's and Grande's document retention and/or destruction policies.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 70:**

Documents sufficient to show Patriot's and Grande's organizational charts and structure, and executive titles and job occupants, since January 1, 2010.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and



are in Patriot's possession, custody, or control.

REQUEST NO. 71:

All documents supporting, refuting, or otherwise concerning your affirmative defenses or any other defense in this lawsuit.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and as seeking privileged attorney-client communications and/or protected work product. Patriot further objects to this request as seeking irrelevant information, as Patriot has not asserted affirmative defenses at this point in the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents during the relevant time period, to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 72:

Documents sufficient to identify any fact witnesses you intend to call as a witness at any trial or hearing in this lawsuit, including the witness's contact information, employment history, and a list of topics that the witness will be called to testify about.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and as seeking privileged attorney-client communications and/or protected work product. Patriot further objects to this request as premature, in that it seeks the disclosure of witnesses prior to the date prescribed by the Court. Based on these objections, Patriot will not produce any documents. Patriot instructs Plaintiffs to review Patriot's Initial Disclosure's for disclosed individuals.

REQUEST NO. 73:

Documents sufficient to identify any expert witnesses you intend to call as a witness at

any trial or hearing in this case or that will submit an expert report in this case, including the expert witnesses' curriculum vitae, contact information, employment history, testifying experience, publications, and the topics that the witness will testify about or opine on.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and as seeking privileged attorney-client communications and/or protected work product. Patriot further objects to this request as premature, in that it seeks the disclosure of expert witnesses prior to the date prescribed by the Court. Based on these objections, Patriot will not produce any documents.

**REQUEST NO. 74:**

All documents concerning the Cox Litigation.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome, and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

**REQUEST NO. 75:**

All documents concerning any pending, threatened, or concluded lawsuit, arbitration, dispute resolution proceeding, investigation, or other matter involving Patriot or any ISP, concerning claims of copyright infringement.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or

protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

REQUEST NO. 76:

All communications between Patriot and any ISP, concerning the following topics: Plaintiffs, copyright infringement, the DMCA, repeat infringer policies, BitTorrent, Peer-to-Peer file sharing, customer monitoring, and the Cox Litigation.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or protected work product, and as not proportional to the needs of the case. Based on these objections, Patriot will not produce any documents.

REQUEST NO. 77:

All documents that you intend to use as exhibits in the trial or any hearing in this lawsuit.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad, unduly burdensome and premature. Patriot further objects to this request to the extent it seeks privileged attorney-client communications and/or protected work product.

REQUEST NO. 78:

All documents you identify or rely on in responding to Plaintiffs' Interrogatories.

**RESPONSE:**

In addition to its General Objections, Patriot objects to this request as overly broad and seeking irrelevant information, as seeking privileged attorney-client communications and/or

protected work product, and as not proportional to the needs of the case.

Subject to its objections, Patriot will produce, within 60 days, or at such other time as the parties may agree, responsive, non-privileged documents to the extent such documents exist and are in Patriot's possession, custody, or control.

Respectfully submitted,

Dated: July 17, 2017

By: /s/ Richard L. Brophy  
Richard L. Brophy  
ARMSTRONG TEASDALE LLP

*Attorney for Defendant Patriot Media  
Consulting, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2017, I served the foregoing electronically to the following:

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